REMARKS

The Office Action dated February 27, 2007 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto. Claims 17-19 and 21 are pending in the present application and respectfully are submitted for consideration.

Claims 17-19 and 21 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,772,336 to Dixon. Applicant notes that the filing date of Dixon is October 15, 1999. Dixon claims priority from U.S. Provisional Application No. 60/104559 filed on October 16, 1998. The current application has a priority date of July 7, 1998, which is earlier than the priority date of Dixon. Thus, Dixon is not a valid prior art reference under 35 U.S.C. 102(e). In light of the Dixon being an invalid prior art reference under 35 U.S.C. 102(e), Applicant requests that the rejection of claims 17-19 and 21 be withdrawn.

Nevertheless, even if the Office Action determines that Dixon is a valid prior art reference under 35 U.S.C. 102(e), the rejection is traversed as being based on a reference that neither teaches nor suggests the novel combination of features clearly recited in independent claims 17 and 21.

Claim 17, upon which claims 18 and 19 are dependent, recites an authentication method for a terminal. The method includes receiving a set of challenges from a telecommunications network. The method also includes choosing one challenge from the set of challenges. The method also includes determining a response and a key based on

the chosen challenge. The method also includes determining an authenticator based on the key corresponding to the chosen challenge. The method also includes transmitting the authenticator and the data unit to the telecommunications network. The data unit relates to the manner in which the authenticator is formed. The method also includes notifying the telecommunications network of the chosen challenge.

Claim 21 recites terminal for a telecommunications network. The terminal is configured to receive a set of challenges from a telecommunications network. The terminal is also configured to choose one challenge from a set of challenges. The terminal also is configured to determine a response and a key based on the chosen challenge. The terminal also is configured to determine an authenticator based on the key corresponding to the chosen challenge. The terminal also is configured to transmit the authenticator and the data unit to the telecommunications network. The data unit relating to the manner in which the authenticator is formed and notifies the telecommunications network of the chosen challenge.

As outlined below, Applicant submits that the cited reference of Dixon does not teach or suggest the elements of claims 17-19 and 21.

Dixon discloses a method of authenticating access to a computer system or central processor. The computer system is in data communication with a plurality of stored challenges and response pairs in a set, with one challenge corresponding to only one response. After a user successfully logs onto the system, the system randomly selects one of the challenges from the set to which the user must respond. If, after comparing the user

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response with the response in the set corresponding to the selected challenge, the system determines a match, the system continues to select challenges and prompting for responses and will ultimately allow access to the central processor after a predetermined number of matches are received from the user.

Applicant submits that Dixon does not teach or suggest each of the elements of the presently pending claims. The present invention is concerned with an authentication method intended for a telecommunications network. Each of the presently pending claims, in part, recites receiving a set of challenges from a telecommunications network. There is no teaching or suggestion in Dixon of receiving a set of challenges from a telecommunications network, nor is there any teaching or suggestion in Dixon of a terminal for a telecommunications network. Based on the distinctions present above, Applicant respectfully asserts that the rejection under 35 U.S.C. §102(e) should be withdrawn because Dixon fails to teach or suggest each feature of claims 17 and 21 and hence, dependent claims 18 and 19 thereon.
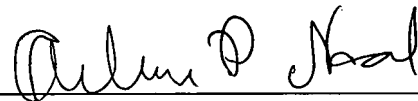
As noted above, Applicant submits that each of claims 17-19 and 21 recite subject matter that is neither disclosed nor suggested by the cited reference. Applicants respectfully request that all of claims 17-19 and 21 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by

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telephone, the applicant's' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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Enclosures: Petition for Extension of Time
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